

1 Ji-In Lee Houck (SBN 280088)  
jiin@houckfirm.com  
2 **THE HOUCK FIRM**  
3 16501 Ventura Blvd, Suite 400-199  
Encino, CA 91436  
4 Tel: (888) 446-8257

5 Brett Lewis, Esq. (*pro hac vice*)  
Brett@iLawco.com  
6 Michael Cilento, Esq. (*pro hac vice*)  
Michael@iLawco.com  
7 **LEWIS & LIN, LLC**  
77 Sands Street, 6th Floor  
8 Brooklyn, NY 11201  
Tel: (718) 243-9323  
9 Fax: (718) 243-9326

10 *Attorneys for VPN.COM LLC*

11 **UNITED STATES DISTRICT COURT**

12 **CENTRAL DISTRICT OF CALIFORNIA**

13 VPN.COM LLC,

14 Plaintiff,

Case No: 2:22-cv-04453-AB-MAR

15 vs.

16 GEORGE DIKIAN et al.

17 Defendants.

**STIPULATION AND ORDER TO  
MODIFY SCHEDULING ORDER**

---

21 **STIPULATION AND ORDER**

**WHEREAS**, on February 9, 2023, this Court issued a Scheduling Order (ECF 39);

**WHEREAS**, the parties jointly request limited modification of certain deadlines in the Scheduling Order as follows:

<u>Deadline</u>	<u>Current</u>	<u>Proposed</u>
Hearing on Motion to Amend Pleadings / Add Parties	05/24/2023	7/28/2023
Non-Expert Discovery Cutoff	07/10/2023	08/04/2023
Expert Disclosure (initial)	06/03/2023	07/03/2023
Expert Disclosure (rebuttal)	07/03/2023	08/03/2023
Expert Discovery Cut-Off	08/03/2023	09/04/2023

•  
,

**WHEREAS**, good cause exists, as the parties require more time to complete discovery obligations, due to the nature and complexity of the action and discovery, and given certain scheduling conflicts of the parties and counsel as relates to depositions; and

**WHEREAS**, the limited modifications will not affect the other dates in the Scheduling Order:

**IT IS THUS STIPULATED AND AGREED**, by and between the parties, through undersigned counsel, that the Scheduling Order is modified to the extent of providing the following new case deadlines:

<u>Deadline</u>	<u>New Case Date</u>
Hearing on Motion to Amend Pleadings / Add Parties	07/28/2023
Non-Expert Discovery Cutoff	08/04/2023
Expert Disclosure (initial)	07/03/2023
Expert Disclosure (rebuttal)	08/03/2023
Expert Discovery Cut-Off	09/04/2023

**IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.**